

EXHIBIT C

CITY AND COUNTY OF SAN FRANCISCO



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City Attorney

OFFICE OF THE CITY ATTORNEY

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April 8, 2024

Barbara Leslie, President, Oakland Board of Port Commissioners
Members of the Oakland Board of Port Commissioners
Danny Wan, Executive Director
Mary C. Richardson, Port Attorney
Port of Oakland
530 Water Street
Oakland, CA 94607

Craig Simon
Interim Director of Aviation
Metropolitan Oakland International Airport
One Airport Drive
Oakland, CA 94621

Re: Request to Reconsider the Proposed Renaming of Metropolitan Oakland
International Airport to Avoid Legal Action

Dear President Leslie, Members of the Board of Port Commissioners, Executive Director Wan,
Interim Aviation Director Simon, and Port Attorney Richardson:

My Office represents the City and County of San Francisco (the "City"), including the
Office of the Mayor, the Board of Supervisors, and the Airport Commission, which operates San
Francisco International Airport ("SFO").

I write to join the City's strong objections to the proposed renaming of Metropolitan
Oakland International Airport to "San Francisco Bay Oakland International Airport," scheduled
for consideration at the April 11, 2024 meeting of the Oakland Board of Port Commissioners.
(See Mayor London Breed's April 8, 2024 letter; Airport Director Ivar C. Satero's April 1, 2024
letter; and the San Francisco Board of Supervisors' resolution, adopted April 2, 2024. Copies of
these documents are attached.)

I further request that the Oakland Board of Port Commissioners promptly cancel its plans
to rename its airport as currently proposed and consider a different name that does not include
the words "San Francisco." Should you continue in these efforts, I intend to pursue legal action
to prevent your use of the proposed new name.

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As you know, SFO is one of the busiest airports in the world, serving more than 50 million domestic and international passengers in 2023. SFO began operations almost a century ago in 1927, and has used the name “San Francisco Airport” or “San Francisco International Airport” throughout most of its history. The names “San Francisco Airport” and “San Francisco International Airport” are famous and highly recognizable among consumers in connection with the airport services that only SFO provides.

The City owns U.S. federal trademark registrations for the marks “San Francisco International Airport” (Reg. No. 4,189,396) and the International Air Transport Association assigned airport code SFO together with SFO's Design Registration (Reg. No. 3,329,780). The City has held these registrations for such a long time that they have become incontestable under federal law. That means they constitute conclusive evidence of the validity of the marks as well as the City's exclusive rights to use the marks. Indeed, there is and only ever has been one airport in the United States that uses “San Francisco” in its name.

Given SFO's long history with the name “San Francisco International Airport” (and previously “San Francisco Airport”), its high recognition in the marketplace, and its trademark status, the proposed new name will be very highly likely to cause confusion or mistake among consumers and the public generally. That very high risk of confusion or mistake is because consumers will either misunderstand Oakland International Airport's physical location (i.e., that it's in San Francisco rather than Oakland) or mistakenly believe that there is a formal relationship or connection between the two airports that does not exist.

More specifically, the proposed new name “San Francisco Bay Oakland International Airport” incorporates the entirety of the City's registered mark, with the first two words of the proposed name (i.e., “San Francisco”) being identical and most prominent. The location of “San Francisco” at the beginning of the name further enhances the very high likelihood of consumer and public confusion. Oakland International Airport's published statements suggest that it chose to include the term “San Francisco” in its new name to intentionally divert travelers who may be unfamiliar with the relevant geography and lead them to believe that the Oakland International Airport is located in San Francisco or has a business relationship with SFO, which it does not.

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While the proposed new name is very likely to cause confusion and mistakes broadly, the problem will be particularly acute for an audience of international travelers who may not speak or read English. Those international travelers comprise an essential part of SFO's consumer base.

For all these reasons, based on the undisputed similarity and the resulting very high likelihood of confusion between the City's registered trademark "San Francisco International Airport" and the proposed "San Francisco Bay Oakland International Airport," if you proceed with the proposed renaming, the City has strong legal claims, including, among others, federal trademark infringement and federal trademark dilution claims, and related common law and state claims for trademark infringement, that we intend to bring in court against the Port of Oakland, as a department of the City of Oakland.

Accordingly, on behalf of the City, including SFO, I request that the Port of Oakland promptly cancel its announced plans to change the name of Metropolitan Oakland International Airport to "San Francisco Bay Oakland International Airport," and consider alternatives to achieve its stated goals of increasing consumer patronage and value that avoid infringing on the City's registered trademark. I invite the Port of Oakland staff to consult with SFO staff, who are prepared to work collaboratively on alternative names that would not create confusion for consumers and the public. If the Port of Oakland instead elects to proceed with the proposed name change, then unfortunately the City will have no choice other than to pursue necessary legal action.

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Very truly yours,



DAVID CHIU
City Attorney

encl: April 1, 2024 Letter from SFO Airport Director Ivar C. Satero to President Leslie
April 2, 2024 San Francisco Board of Supervisors Resolution
April 8, 2024 Letter from Mayor Breed to President Leslie

cc: Mayor London Breed
SFO Airport Director Ivar C. Satero
San Francisco Airport Commission
San Francisco Board of Supervisors

OFFICE OF THE MAYOR
SAN FRANCISCO



LONDON N. BREED
MAYOR

April 8, 2024

Barbara Leslie
President, Oakland Board of Port Commissioners
30 Water Street
Oakland, CA 94607

RE: Proposed Renaming of Metropolitan Oakland International Airport – OPPOSE

Dear President Leslie,

On behalf of the City and County of San Francisco, I write to oppose the proposed renaming of Metropolitan Oakland International Airport (OAK) to “San Francisco Bay Oakland International Airport,” scheduled for consideration at the April 11, 2024 meeting of the Oakland Board of Port Commissioners.

The San Francisco International Airport (SFO) has operated since 1927 and its name is immediately recognizable to visitors from all over the world. Last year, 50 million passengers walked through its doors and experienced the results of the significant investments we have made to make SFO the airport it is today. The creation of the International Terminal over twenty years ago, along with major upgrades to almost all SFO terminals, attract the level of international and domestic flights that draw Airlines that want to operate and grow at SFO.

Given SFO’s stellar brand standing and associated name recognition in air transportation, this misguided proposal will cause confusion for the public, either through a misunderstanding of physical location or the airport’s relationship to SFO. As a major international gateway, this concern would be compounded when considering an audience of travelers for whom English is not their first language.

We encourage Oakland Airport to follow a similar model to SFO and grow its airport services rather than adding “San Francisco” to its name. Oakland is a great city with a rich history. Many of my friends live there, many of our city workers commute from there, and I always enjoy visiting our neighbor across the bay. It is rich in culture and wonderful people and has its own unique identity. It does not need the name San Francisco as part of its airport to stand out.

I formally oppose Oakland International Airport changing its name in any way that would incorporate "San Francisco" into its airport name.

Sincerely,

A handwritten signature in blue ink, reading "London Breed". The signature is fluid and cursive, with the first name "London" and last name "Breed" clearly distinguishable.

London N. Breed
Mayor

San Francisco International Airport

April 1, 2024

Barbara Leslie
President, Oakland Board of Port Commissioners
30 Water Street
Oakland, CA 94607

TRANSMITTED VIA EMAIL*bleslie@portoakland.com***SUBJECT: Proposed Renaming of Metropolitan Oakland International Airport**

Dear President Leslie:

San Francisco International Airport (SFO) formally objects to the proposed renaming of Metropolitan Oakland International Airport (OAK) to "San Francisco Bay Oakland International Airport" (File ID: 094-24), scheduled for consideration at the April 11, 2024 meeting of the Oakland Board of Port Commissioners.

As you know, SFO is among the largest airports in the United States, having served over 50 million passengers in 2023, and has operated under the name "San Francisco Airport" or "San Francisco International Airport" since 1927 — making it immediately recognizable to customers. We have built on this brand success for decades and are opposed to OAK using any form of the historic and geographically significant name "San Francisco" in its name.

SFO is owned and operated by the City and County of San Francisco, and San Francisco owns U.S. federal registrations for the marks SAN FRANCISCO INTERNATIONAL AIRPORT (Reg. No. 4,189,396) and the code SFO together with the Airport's logo or design (Reg. No. 3,329, 780). Given this legal brand standing and the associated name recognition in air transportation, we anticipate the proposed change considered by the Port of Oakland Commission for OAK will cause confusion for the public, either through a misunderstanding of its physical location or relationship to SFO.

SFO formally requests that you not proceed with any name change for OAK that would use the name "San Francisco".

Very truly yours,



Ivar C. Satero
Airport Director

cc: Mayor London N. Breed, City and County of San Francisco
Mayor Sheng Thao, City of Oakland
San Francisco Airport Commissioners
Oakland Board of Port Commissioners
Danny Wan, Executive Director, Port of Oakland
Craig Simon, Interim Aviation Director, Port of Oakland

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

LONDON N. BREED
MAYORMALCOLM YEUNG
PRESIDENTEVERETT A. HEWLETT, JR.
VICE PRESIDENT

JANE NATOLI

JOSE F. ALMANZA

MARK BUELL

IVAR C. SATERO
AIRPORT DIRECTOR

FILE NO. 240329

RESOLUTION NO.

[Opposing Proposed Renaming of the Metropolitan Oakland International Airport]

Resolution opposing the proposed renaming of the Metropolitan Oakland International Airport to “San Francisco Bay Oakland International Airport” and urging the Port of Oakland Commission to reject any name change that would use the name “San Francisco.”

WHEREAS, The Port of Oakland Commission will be considering an ordinance to approve the renaming of “Metropolitan Oakland International Airport” (OAK) to “San Francisco Bay Oakland International Airport” on April 11, 2024, which they unexpectedly announced the Friday before spring break when many students would be flying, and also without any advance notice to San Francisco officials who will be on legislative recess next week; and

WHEREAS, The San Francisco International Airport (SFO) is owned by the City and County of San Francisco, and is among the largest airports in the United States, having served over 50 million passengers in 2023; and

WHEREAS, SFO has operated since 1927, and has used the name “San Francisco Airport” or “San Francisco International Airport” for most of its history, making it immediately recognizable to customers; and

WHEREAS, San Francisco owns U.S. federal registrations for the marks SAN FRANCISCO INTERNATIONAL AIRPORT (Reg. No. 4,189,396) and the code SFO together with the Airport’s logo or design (Reg. No. 3,329,780); and

WHEREAS, Given this long history of SFO ownership, and the strong associated name and brand recognition in air transportation, the proposal to rename OAK to “San Francisco Bay Oakland International Airport” will cause significant confusion for the travelling public and

1 others, as well as potential economic impacts for businesses that have products delivered by
2 plane, either through a misunderstanding of its physical location or relationship to SFO; and

3 WHEREAS, As a major international gateway, this concern is heightened when
4 considering the large number of international travelers who do not speak or read English,
5 potentially compounding the confusion; now, therefore, be it

6 RESOLVED, That the Board of Supervisors of the City and County of San Francisco is
7 opposed to the renaming of OAK to “San Francisco Bay Oakland International Airport;” and,
8 be it

9 FURTHER RESOLVED, That the Board of Supervisors urgently requests that the Port
10 of Oakland Commission reject any name change for OAK that would use the historically and
11 geographically significant name “San Francisco” in any way; and, be it

12 FURTHER RESOLVED, That the Board of Supervisors is committed to collaborating
13 across the Bay to uplift the collective and mutual best interests of all its Bay Area neighboring
14 cities, including Oakland and San Jose; and, be it

15 FURTHER RESOLVED, That the Clerk of the Board of Supervisors is directed to
16 transmit copies of this resolution to the Port of Oakland’s Board of Commissioners, as an
17 expression of San Francisco’s strong opposition to the proposed renaming.